NEW MEXICO
ENVIRONMENT DEPARTMENT

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Jennifer J. Pruett
Deputy Secretary

Certified Mail – Return Receipt Requested

August 29, 2019

Mr. Scott Berry, City Manager
City of Raton
P.O. Box 910
224 Savage Ave.
Raton, New Mexico 87740

Re: Raton Water Treatment Plant; Minor Industrial; SIC 4941; NPDES Compliance Evaluation Inspection; NPDES #NM0029891; August 20, 2019

Dear Mr. Berry:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Further explanations and problems noted during this inspection are discussed on the completed form and checklist of this inspection report. Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

NPDES Enforcement Coordinator
Environmental Protection Agency,
Region 6 Water Enforcement Branch (6ECDWM)
1201 Elm Street, Suite 500
Dallas, Texas 75202

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

David Long (Long.David@epa.gov) is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at (505)827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6ECDWM) by e-mail
David Long, USEPA (6ECDWM) by e-mail
Nancy Williams, USEPA (6ECDWA) by e-mail
Amy Andrews, USEPA (6ECDWM) by e-mail
David Esparza, USEPA (6ECDWM) by e-mail
Brent Larsen USEPA (6WDPE) by e-mail
Robert Italiano, NMED District II by e-mail
Dan Campbell, City of Raton by e-mail

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	yr/mo/day	17	Inspec. Type	18	Inspector	19	Fac Type	20
	N	5	NM0029891		190820		C		S		2	

Remarks: MINOR INDUSTRIAL

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	74	75	Reserved	80
				4		N		N					

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
Raton Water Treatment Plant – from I-25, take exit 454 and make a left turn at the stop. Follow road for about 2 miles. Turn left onto N. 1st Street, follow N. 1st Street to plant.
Colfax County

Entry Time /Date: 8:15A 8-20-19
Exit Time/Date: 9:24A 8-20-19
Permit Effective Date: 9/1/2016
Permit Expiration Date: 8/31/21

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Dan Campbell/General Manager/575-445-3861warehouse 575-445-8092 filter plant 575-445-95919
Anthony Bustos/Plant Superintendent/ 575-445-959

Other Facility Data
N. 36.918267
W. -104.433844
SIC 4941

Name, Address of Responsible Official/Title/Phone and Fax Number
Mr. Scott Berry/City Manager/ P.O. Box 910, 224 Savage Ave., Raton, New Mexico 87740/ 575-445-9551, fax 575-445-3398

Contacted: Yes [ ] No [x]

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	S	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

No discharge has occurred this permit cycle. See attached sheets for further details.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Jennifer Foote */s/ Jennifer Foote*	**NMED/SWQB 505-827-0596**	**8/29/19**
Signature of Management QA Reviewer **Sarah Holcomb, Program Manager** */s/ Sarah Holcomb*	**Agency/Office/Phone and Fax Numbers** **NMED/SWQB 505-827-2798**	**Date** **8/29/19**

EPA Form 3560-3 (Rev. 9-94) Previous editions are obsolete.

FACILITY NAME Raton WTP	DATE 8/20/19	PERMIT NO. NM0029891

SECTION A - PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS:	☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED No*)
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	☒ Y ☐ N ☐ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	☐ Y ☐ N ☒ NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	☒ Y ☐ N ☐ NA
4. ALL DISCHARGES ARE PERMITTED	☒ Y ☐ N ☐ NA
SECTION B - RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. DETAILS:	☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED NO*)
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	☐ Y ☐ N ☒ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	☐ S ☐ M ☐ U ☒ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	☐ Y ☐ N ☒ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	☐ Y ☐ N ☒ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	☐ Y ☐ N ☒ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	☐ Y ☐ N ☒ NA
e) DATES AND TIMES OF ANALYSES.	☐ Y ☐ N ☒ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	☐ Y ☐ N ☒ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	☐ S ☐ M ☐ U ☒ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR	☐ S ☐ M ☐ U ☒ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	☐ Y ☐ N ☒ NA
SECTION C - OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. DETAILS:	☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED No*)
1. TREATMENT UNITS PROPERLY OPERATED.	☒ S ☐ M ☐ U ☐ NA
2. TREATMENT UNITS PROPERLY MAINTAINED.	☒ S ☐ M ☐ U ☐ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.	☒ S ☐ M ☐ U ☐ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☒ S ☐ M ☐ U ☐ NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE.	☒ S ☐ M ☐ U ☐ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	☒ S ☐ M ☐ U ☐ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	☒ S ☐ M ☐ U ☐ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	☒ Y ☐ N ☐ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	☒ Y ☐ N ☐ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	☐ Y ☐ N ☒ NA

FACILITY NAME Raton WTP	DATE 8/20/19	PERMIT NO. NM0029891

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?	☐ Y ☒ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?	☐ Y ☐ N ☒ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	☐ Y ☐ N ☒ NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?	☐ Y ☐ N ☒ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	☐ Y ☐ N ☒ NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED Yes).*
DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	☐ Y ☐ N ☒ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☒ Y ☐ N ☐ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	☐ Y ☐ N ☒ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	☐ Y ☐ N ☒ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	☐ Y ☐ N ☒ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	☒ Y ☐ N ☐ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	☐ Y ☐ N ☒ NA
b) PROPER PRESERVATION TECHNIQUES USED.	☐ Y ☐ N ☒ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	☐ Y ☐ N ☒ NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	☐ Y ☐ N ☒ NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED No)*
DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE estimate	☒ Y ☐ N ☐ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	☐ Y ☐ N ☒ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	☐ Y ☐ N ☒ NA
4. CALIBRATION FREQUENCY ADEQUATE. *(DATE OF LAST CALIBRATION)*	☐ Y ☐ N ☒ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	☐ Y ☐ N ☒ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	☐ Y ☐ N ☒ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	☐ Y ☐ N ☒ NA
6. HEAD MEASURED AT PROPER LOCATION.	☐ Y ☐ N ☒ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	☐ Y ☐ N ☒ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED No)*
DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)*	☒ Y ☐ N ☐ NA

FACILITY NAME Raton WTP	DATE 8/20/19	PERMIT NO. NM0029891

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☐ S ☐ M ☐ U ☒ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. ☐ S ☐ M ☐ U ☒ NA

5. DUPLICATE SAMPLES ARE ANALYZED. ___ % OF THE TIME. ☐ Y ☐ N ☒ NA

6. SPIKED SAMPLES ARE ANALYZED. ___ % OF THE TIME. ☐ Y ☐ N ☒ NA

7. COMMERCIAL LABORATORY USED. ☐ Y ☐ N ☒ NA

LAB NAME
LAB ADDRESS
PARAMETERS PERFORMED

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED NO).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	n/a	n/a	n/a	n/a	n/a	n/a	No discharge

RECEIVING WATER OBSERVATIONS

Facility stated there has been no discharge since the 70's.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED NO).*
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☐ S ☐ M ☐ U ☒ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☐ S ☐ M ☐ U ☒ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED NO).*

1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☐ N ☒ NA

2. TYPE OF SAMPLE OBTAINED
GRAB _____ COMPOSITE SAMPLE ___ METHOD _____ FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ☒ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☒ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☒ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☒ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☒ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☒ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☒ NA

Compliance Evaluation Inspection
Raton Water Treatment Plant
NPDES Permit NM0029891
Inspection Date: August 20, 2019
Further Explanations

INTRODUCTION:
On August 20, 2019, Jennifer Foote of the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB), accompanied by Amy Andrews of the U.S. Environmental Protection Agency (USEPA), conducted a Compliance Evaluation Inspection at the Raton Water Treatment Plant (WTP). The Raton WTP has a design flow discharge capacity of 0.08 MGD (million gallons per day) and is classified as a minor industrial discharger under the Federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0029891. This permit regulates the WTP discharge to an ephemeral arroyo, thence to Raton Creek, thence to Chicorica Creek, thence to the Canadian River in segment 20.6.4.305 of the Canadian River Basin according to the State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 NMAC. This segment includes the designated uses of irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat and primary contact.

The NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the Federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspector, electronic DMRs, and records and reports kept by the permittee and/or NMED.

INSPECTION DETAILS:
After arriving at the facility, the inspector met with Mr. Anthony Bustos, Filter Plant Superintendent, and presented credentials and explained the purpose of the inspection. Mr. Bustos and Mr. Dan Campbell, General Manager, conducted a tour of the facility and described ongoing and future planned improvements. An exit interview was conducted to present the preliminary findings of the inspection.

TREATMENT SCHEME:
The Raton Water Treatment Plant is a municipal drinking water treatment facility. The plant was built in 1946 and is currently undergoing renovations. The facility is designed for total reuse of its wastewater, but maintains the permit in case an event occurs when they cannot reclaim all the backwash water. The General Manager believes that there hadn't been a discharge from the facility since the 1970's.

The intake water is received from Lake Maloya and/or the Cimarron River. Recently the Cimarron River has been affected by forest fires and is being used less as a water supply. This facility has the ability to treat up to 4 MGD, with the backwash and filter-to-waste water flows generating a flow of approximately 0.08 MGD. The raw water is treated with coagulation, flocculation, sedimentation, filtration and disinfection. Raw water is fed to a large holding tank. The water is then pumped into the facility where aluminum chloride and a polymer are injected. It flows through two large basins where the floc grows in size. The water is then fed into rectangular clarifiers where the floc settles out. After clarification, the water flows into filtration units and then is sent out for distribution. Major treatment operations for the WTP have an alarm system and automatic call out system.

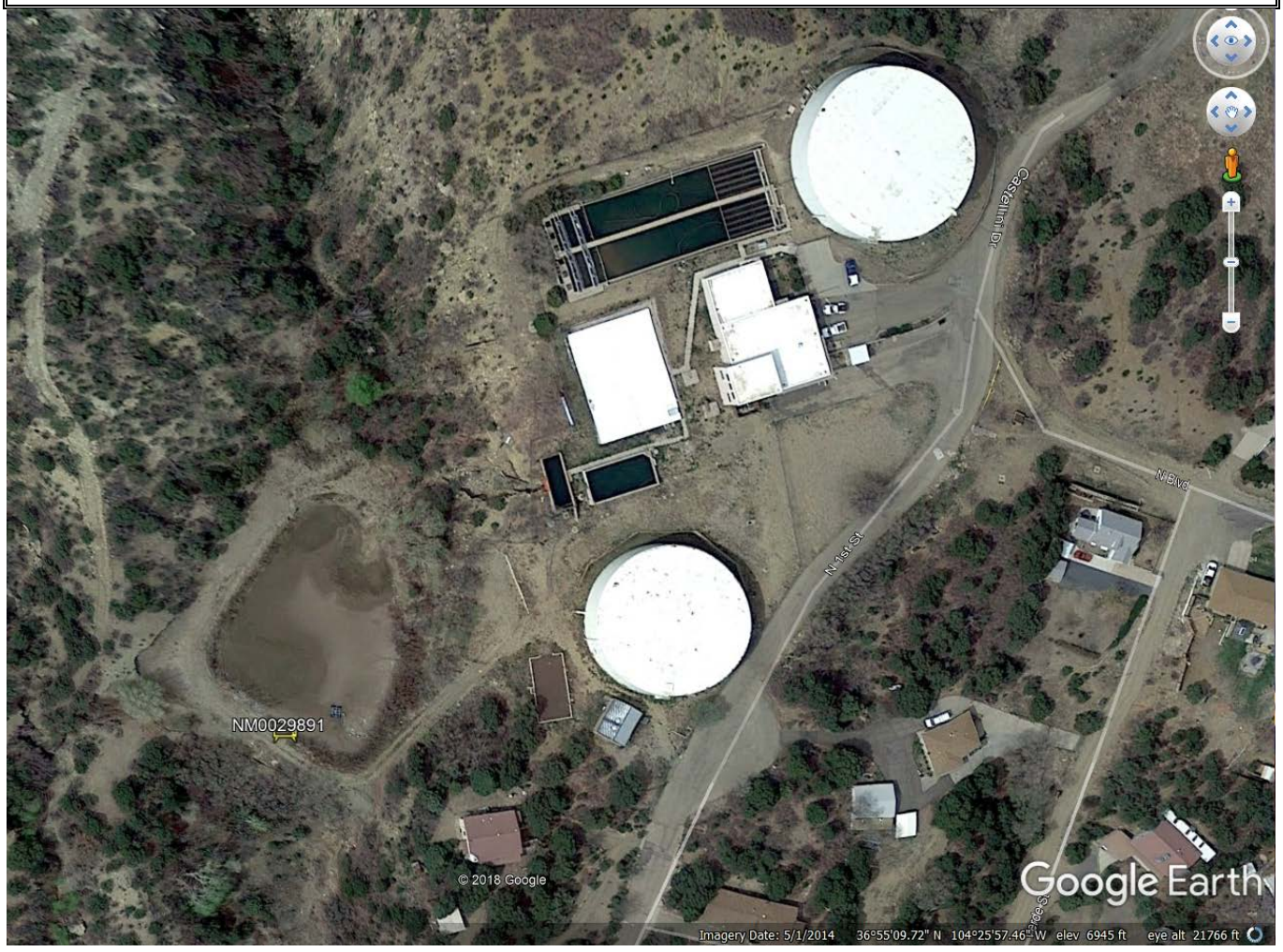
Filter backwash sludge is managed by sending flows from the backwash system into a 660,000 gallon settling basin below the plant by turning a manual valve. The backwash is currently flushed about four times a year and is expected to be reduced to twice a year after renovations. Water from this pond is pumped back up to the holding tanks after the waste has settled. The backwash flow is metered and a mass balance could be done to help estimate flows out of the pond if it were to overflow. If the pond were to overflow it would breach on the west side, where the slopes of the pond have been armored with rip rap. Stormwater has been diverted around the pond through a culvert.

The sludge is periodically removed from the settling basin and may be further dewatered in sludge drying beds prior to transfer of the alum sludge solid to a city owned land-application site.

OBSERVATIONS:
Section D – Self-Monitoring - overall rating of "Satisfactory"
OBSERVATIONS: Since the last inspection, a standard operating procedure (SOP) was established in order to be ready to sample if a discharge event occurs. Chlorine and TSS would be brought to the WWTP Laboratory. Aluminum, gross alpha, tritium and WET testing would be sent to an outside lab. The facility has a cooler onsite with prepared collection bottles and instructions.

Findings: The facility would expect a discharge to only last an hour or so, however additional gallon cubies may be needed for WET testing if the emergency discharge were to occur for several days. Expiration dates for sample bottles with preservative should be monitored and replaced when necessary.

NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Google Earth	Date: 5/1/14	Time: unknown
City/County: Colfax County		State: New Mexico
Location: Raton Water Treatment Plant		
Subject: aerial view of WTP		



NMED/SWQB Official Photograph Log Photo # 2		
Photographer: Jennifer Foote	Date: 8-20-19	Time: 8:47 am
City/County: Colfax County		State: New Mexico
Location: Raton Water Treatment Plant		
Subject: backwash pond